

From: [Lathrop, Sara J](#)
To: [B. Tyler Brooks](#); [Fussy, Tracey](#); [Humayun, Munazza](#); [Szymanski, Adam](#)
Cc: [Peter Breen](#); [Joan Mannix](#); [Nathan Loyd](#); [Erick Kaardal](#); [Elizabeth Nielsen](#); [Mary Gynild](#); [Amelia Knapp](#)
Subject: RE: [EXTERNAL] Pro-Life Action Ministries v. City, No. 0:23-cv-00853 (D. Minn.)
Date: Tuesday, December 10, 2024 2:27:00 PM

Rule 408 Communication

Thanks, Tyler, for the note.

The amendment to chapter 405 passed by the city council on December 5, 2024, is intended to create an exemption for the conduct described in Plaintiff's Amended Complaint, to the extent that conduct is protected by the United States Constitution, the Minnesota Constitution, or federal or Minnesota law. Your claims in this lawsuit assert that the ordinance violated the First Amendment. In our view, the amendment to the ordinance makes any claim going into the future therefore moot, and the Rule 68 offers provide Plaintiffs with the requested nominal damages, plus reasonable fees and costs to be determined by the Court. Therefore, the lawsuit is effectively resolved.

Thank you,
Sara

Sara J. Lathrop
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From: B. Tyler Brooks <tbrooks@thomasmoresociety.org>
Sent: Tuesday, December 10, 2024 1:27 PM
To: Fussy, Tracey <Tracey.Fussy@minneapolismn.gov>; Lathrop, Sara J <sara.lathrop@minneapolismn.gov>; Humayun, Munazza <munazza.humayun@minneapolismn.gov>; Szymanski, Adam <adam.szymanski@minneapolismn.gov>
Cc: Peter Breen <pbreen@thomasmoresociety.org>; Joan Mannix <jmannix@thomasmoresociety.org>; Nathan Loyd <nloyd@thomasmoresociety.org>; Erick Kaardal <kaardal@mklaw.com>; Elizabeth Nielsen <nielsen@mklaw.com>; Mary Gynild <Gynild@mklaw.com>; Amelia Knapp <aknapp@thomasmoresociety.org>
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Dear Counsel,

Thank you for your time yesterday. Please find a letter attached. We will follow up shortly after

Lathrop Ex. 5

we have conferred with all of our clients.

Best regards,

Tyler

B. Tyler Brooks

Senior Counsel

THOMAS MORE SOCIETY

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[EXTERNAL] This email originated from outside of the City of Minneapolis. Please exercise caution when opening links or attachments.